

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: 1:14-CR-151
	:
v.	: (J. Rambo)
	:
ROSE UMANA	:

**GOVERNMENT’S REQUEST FOR TEMPORARILY MODIFYING  
THE CONDITIONS OF SUPERVISION WITH THE CONSENT OF  
THE OFFENDER AND PROBATION OFFICE**

The United States of America, by its attorneys, David J. Freed, United States Attorney for the Middle District of Pennsylvania, and Jenny P. Roberts, Assistant United States Attorney, requests that this Court grant the Government’s Request for Temporarily Modifying the Conditions of Supervision with the Consent of the Offender and Probation Office.

1. On December 21, 2016, this court sentenced the defendant to thirty-six (36) months imprisonment and three (3) years of supervised release. (Doc. 126).

2. The defendant was ordered to pay restitution in the amount of \$1,184,224.67 in minimum monthly installments of no less than \$250.00.

3. The defendant was released from prison on August 12, 2019.

4. The government sent a financial statement to the defendant to complete and the defendant informed the government that she will be receiving an annuity payment of \$45,000 from her ex-husband.

5. After reviewing the defendant's financial statement, the government contacted the defendant regarding the annuity payment. An agreement was made with the defendant that she would make a lump sum payment in the amount \$8,000.00 from the annuity payment. The rest of the money will be used to assist the defendant in becoming more financially stable.

6. The defendant also requested that her minimum monthly payments temporarily be reduced to no less than \$75.00 with the understanding that her financial circumstances will be evaluated by the government next year and that her minimum monthly payment will be raised if appropriate.

7. The government and probation concur with the defendant's request at the discretion of the court.

WHEREFORE, for the reasons explained above, the government requests that this Court grant the government's request for a temporary modification of the defendant's conditions of supervision.

Respectfully submitted,

DAVID J. FREED  
UNITED STATES ATTORNEY

/s/ Jenny P. Roberts  
JENNY P. ROBERTS  
Assistant United States Attorney  
Jenny.p.roberts@usdoj.gov  
Bar ID 89330  
235 North Washington Ave  
Scranton, Pa 18501  
(570)348-2800

Date: October 10, 2019

**CERTIFICATION**

I hereby certify that on October 10, 2019, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by First Class United States Mail to anyone unable to accept filing on the Notice of Electronic filing, specifically, the defendant located at the below address:

Rose Umana  
1202 Summit Way  
Mechanicsburg, PA 17050

/s/ Jenny P. Roberts  
Jenny P. Roberts  
Assistant United States Attorney